

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 12

LV CHC HOLDINGS I, LLC d/b/a CONSULATE HEALTH CARE;  
1026 ALBEE FARM ROAD OPERATIONS LLC d/b/a BAY BREEZE  
HEALTH AND REHABILITATION CENTER; 216 SANTA BARBARA  
BOULEVARD OPERATIONS LLC d/b/a CORAL TRACE HEALTH  
CARE; MIAMI FACILITY OPERATIONS LLC d/b/a FRANCO  
NURSING & REHABILITATION CENTER; 3001 PALM COAST  
PARKWAY OPERATIONS LLC d/b/a GRAND OAKS HEALTH AND  
REHABILITATION CENTER; 2826 CLEVELAND AVENUE  
OPERATIONS LLC d/b/a HERITAGE PARK REHABILITATION AND  
HEALTHCARE; 4200 WASHINGTON STREET OPERATIONS LLC  
d/b/a HILLCREST HEALTH CARE AND REHABILITATION  
CENTER; KISSIMMEE FACILITY OPERATIONS LLC d/b/a  
CONSULATE HEALTH CARE OF KISSIMMEE; 710 NORTH SUN  
DRIVE OPERATIONS LLC d/b/a LAKE MARY HEALTH AND  
REHABILITATION CENTER; NORTH FORT MYERS FACILITY  
OPERATIONS LLC d/b/a CONSULATE HEALTH CARE OF NORTH  
FORT MYERS; 650 REED CANAL ROAD OPERATIONS LLC d/b/a  
OAKTREE HEALTHCARE; 5405 BABCOCK STREET OPERATIONS  
LLC d/b/a THE PALMS REHABILITATION AND HEALTHCARE  
CENTER; 9311 SOUTH ORANGE BLOSSOM TRAIL OPERATIONS  
LLC d/b/a PARKS HEALTHCARE AND REHABILITATION  
CENTER; 4641 OLD CANOE CREEK ROAD OPERATIONS LLC d/b/a  
PLANTATION BAY REHABILITATION CENTER; 5065 WALLIS  
ROAD OPERATIONS LLC d/b/a RENAISSANCE HEALTH AND  
REHABILITATION; 7950 LAKE UNDERHILL ROAD OPERATIONS  
LLC d/b/a RIO PINAR HEALTH CARE; 3920 ROSEWOOD WAY  
OPERATIONS LLC d/b/a ROSEWOOD HEALTH AND  
REHABILITATION CENTER; 2170 CORTEZ BOULEVARD  
OPERATIONS LLC d/b/a SPRING HILL HEALTH AND  
REHABILITATION CENTER; 1550 JESS PARRISH COURT  
OPERATIONS LLC d/b/a VISTA MANOR; WEST ALTAMONTE  
FACILITY OPERATIONS LLC d/b/a CONSULATE HEALTH CARE  
AT WEST ALTAMONTE; WEST PALM BEACH FACILITY  
OPERATIONS LLC d/b/a CONSULATE HEALTH CARE OF WEST  
PALM BEACH

and

1199SEIU, UNITED HEALTH CARE WORKERS EAST, FLORIDA  
REGION

Case: 12-CA-249715

LV CHC HOLDINGS I, LLC d/b/a CONSULATE HEALTH CARE;  
6305 CORTEZ ROAD WEST OPERATIONS LLC d/b/a BRADENTON  
HEALTH CARE; 2939 SOUTH HAVERHILL ROAD OPERATIONS  
LLC d/b/a CORAL BAY HEALTHCARE AND REHABILITATION;  
1851 ELKCAM BOULEVARD OPERATIONS LLC d/b/a DELTONA  
HEALTH CARE; 1820 SHORE DRIVE OPERATIONS LLC d/b/a THE  
HEALTH AND REHABILITATION CENTRE AT DOLPHIN'S VIEW;  
3735 EVANS AVENUE OPERATIONS LLC d/b/a EVANS HEALTH  
CARE; 611 SOUTH 13th STREET OPERATIONS LLC D/B/A FORT  
PIERCE HEALTH CARE; 2916 HABANA WAY OPERATIONS LLC  
d/b/a HABANA HEALTH CARE CENTER; 11565 HARTS ROAD  
OPERATIONS LLC d/b/a HARTS HARBOR HEALTH CARE  
CENTER; 125 ALMA BOULEVARD OPERATIONS LLC d/b/a  
ISLAND HEALTH AND REHABILITATION CENTER; 1120 WEST  
DONEGAN AVENUE OPERATIONS LLC d/b/a KEYSTONE  
REHABILITATION AND HEALTH CENTER/KEYSTONE VILLAS  
ASSISTED LIVING CENTER; 207 MARSHALL DRIVE  
OPERATIONS LLC d/b/a MARSHALL HEALTH AND  
REHABILITATION CENTER; 3110 OAKBRIDGE BOULEVARD  
OPERATIONS LLC d/b/a OAKBRIDGE HEALTHCARE CENTER;  
1010 CARPENTERS WAY OPERATIONS LLC d/b/a WEDGEWOOD  
HEALTHCARE CENTER; WINTER HAVEN FACILITY  
OPERATIONS, LLC d/b/a CONSULATE HEALTH CARE OF WINTER  
HAVEN; 6414 13th ROAD SOUTH OPERATIONS LLC d/b/a WOOD  
LAKE HEALTH AND REHABILITATION CENTER

and

UNITED FOOD AND COMMERCIAL WORKERS  
UNION, LOCAL 1625

Case: 12-CA-250209

### **JOINT MOTION FOR POSTPONEMENT OF HEARING**

The above-captioned Respondents, collectively referred to herein as “Respondents,” by and through their counsel, Seyfarth Shaw LLP, together with Charging Parties 1199SEIU, United Health Care Workers East, Florida Region and United Food and Commercial Workers Union, Local 1625, collectively referred to herein as “Charging Parties” and together with Respondents, referred to as the “Parties,” by and through their counsel, Phillips, Richard & Rind P.A., hereby move, pursuant to NLRB Rules and Regulations Section 102.24(a), to reschedule and postpone the hearing currently scheduled in this matter to September 9, 2020. In support of this Motion, the Parties state as follows:

1. On July 21, 2020, the Region issued an Order setting this unfair labor practice hearing to commence before Administrative Law Judge Bogas on August 25, 2020.

2. Since the issuance of the Region's Order setting a hearing date, the Parties have engaged, and continue to engage, in settlement negotiations to resolve the claims at issue in the Consolidated Complaint. The Parties believe that their continued negotiations may lead to a settlement of the Consolidated Complaint.

3. The Parties seek a fifteen-day postponement of the hearing of this matter from August 25, 2020, to September 9, 2020, to further facilitate the resolution of the Consolidated Complaint through settlement and prevent the unnecessary expenditure of Party and Board resources.

4. The Parties participated in a pre-hearing conference call with Judge Bogas and a representative for the General Counsel on August 7, 2020. During the conference call, the General Counsel's representative confirmed that the Board General Counsel has no objection to this motion or the postponement of the hearing to September 9, 2020. Based on the conference, the Parties also understand that Judge Bogas is available to hear this case on September 9, 2020.

5. This postponement is not requested for the purpose of delay and under the circumstances of this case, the requested postponement will have no effect on any potential remedy.

6. A copy of this Motion is being served on all other parties.

WHEREFORE, the Parties respectfully request that the hearing in this matter be rescheduled to begin on September 9, 2020.

Respectfully submitted this August 7, 2020.

PHILLIPS, RICHARD & RIND, P.A.

By: /s/ Kathleen M. Phillips\*

Kathleen M. Phillips

SEYFARTH SHAW LLP

By: /s/ John L. Telford

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*\* Electronically signed with express permission*

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 12

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UNION, LOCAL 1625

Case: 12-CA-250209

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he caused the foregoing Joint Motion for Postponement of Hearing to be electronically filed with the National Labor Relations Board Division of Judges this 7th day of August, 2020, and also caused a true and correct copy to be served by electronic mail upon the following parties:

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*/s/ John L. Telford*  
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